

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§	Group Art Unit: 2626
William K. Bodin, <i>et al.</i>	§	
	§	Examiner: Rider, Justin W
Serial No.: 10/733,941	§	
	§	Atty Docket No.: AUS920030837US1
Filed: 12/11/2003	§	
	§	Customer No.: 34533
Title: Creating A Voice Response	§	
From A User Grammar	§	Confirmation No.: 8707

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Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

APPEAL BRIEF

Honorable Commissioner:

This is an Appeal Brief filed pursuant to 37 CFR § 41.37 in response to the Final Office Action of October 10, 2007 (hereinafter the “Final Office Action”), and pursuant to the Notice of Appeal filed January 9, 2008.

REAL PARTY IN INTEREST

The real party in interest in accordance with 37 CFR § 41.37(c)(1)(i) is the patent assignee, International Business Machines Corporation (“IBM”), a New York corporation having a place of business at Armonk, New York 10504.

RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences within the meaning of 37 CFR § 41.37(c)(1)(ii).

STATUS OF CLAIMS

Status of claims in accordance with 37 CFR § 41.37(c)(1)(iii): Twenty-four (24) claims are filed in the original application in this case. Claims 1-24 are rejected in the Office Action. Claims 1-24 are on appeal.

STATUS OF AMENDMENTS

Status of amendments in accordance with 37 CFR § 41.37(c)(1)(iv): No amendments were submitted after final rejection. The claims as currently presented are included in the Appendix of Claims that accompanies this Appeal Brief.

SUMMARY OF CLAIMED SUBJECT MATTER

Appellants provide the following concise summary of the claimed subject matter according to 37 CFR § 41.37(c)(1)(v). This summary includes a concise explanation of the subject matter defined in each of the independent claims involved in the appeal and includes references to the specification by page and line number and to the drawings by reference characters. The independent claims involved in this appeal are claims 1, 9, and 17.

Claim 1 recites a method for creating a voice response grammar in a voice response server (page 7, lines 5-6). The method of claim 1 includes identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements (page 27, lines 13-16, and Figure 13, elements 208, 372, 374, and 378), each user grammar element including an identifier of a structural element, a key

phrase for invoking a presentation action, and a presentation action identifier representing a presentation action (page 28, lines 11-15, and Figure 5, elements 318, 516, and 518). The method of claim 1 also includes storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server (page 28, lines 25-28, and Figure 13, elements 105 and 386).

Claim 9 recites a system for creating a voice response grammar in a voice response server (page 7, lines 5-15, and Figure 1). The system of claim 9 includes means for identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements (page 27, lines 13-16, and Figure 13, elements 208, 372, 374, and 378), each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action (page 28, lines 11-15, and Figure 5, elements 318, 516, and 518). The system of claim 9 also includes means for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server (page 28, lines 25-28, and Figure 13, elements 105 and 386). The means for carrying out the acts included in the system of claim 9 include a computer system (described for example at page 7, lines 5-15).

Claim 17 recites a computer program product for creating a voice response grammar in a voice response server (page 7, lines 5-6 and lines 17-28). The computer program product of claim 17 includes a recording medium (page 7, lines 17-18). The computer program product of claim 17 also includes means, recorded on the recording medium, for identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements (page 27, lines 13-16, and Figure 13, elements 208, 372, 374, and 378), each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action (page 28, lines 11-15, and Figure 5, elements 318, 516, and 518). The computer program product of claim 17 also includes means, recorded on the recording medium, for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server (page 28,

lines 25-28, and Figure 13, elements 105 and 386). The means for carrying out the acts included in the computer program product of claim 17 include computer program instructions embedded in the recording medium of the computer program product (described for example at page 7, line 17-28).

GROUND OF REJECTION

In accordance with 37 CFR § 41.37(c)(1)(vi), Appellants provide the following concise statement for each ground of rejection:

1. Claims 1-24 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Bryan, *et al.* (U.S. Publication No. 2002/0146015).

ARGUMENT

Appellants present the following argument pursuant to 37 CFR § 41.37(c)(1)(vii) regarding the grounds of rejection on appeal in the present case.

**Argument Regarding The Sole Ground For
Rejection On Appeal: Claims 1-24 Stand Rejected
Under 35 U.S.C. § 102(B) As Being Anticipated By
Bryan, *ET AL.* (U.S. Publication No. 2002/0146015)**

Claims 1-24 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Bryan, *et al.* (U.S. Publication No. 2002/0146015) (hereafter, 'Bryan'). Bryan generally discloses creating, using, and updating individual user voice portals in a multi-user environment. As will be shown below, however, Bryan does not anticipate creating a voice response grammar in a voice response server as claimed in the present application. Claims 1-24 are therefore patentable and should be allowed. Appellants respectfully traverse each rejection individually below and request reconsideration of claims 1-24.

**Bryan Does Not Disclose Each and Every Element
Of The Claims Of The Present Application**

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Independent claim 1 of the present application claims:

1. A method for creating a voice response grammar in a voice response server, the method comprising:

identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements, each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action; and

storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server.

For the reasons discussed below, Bryan does not disclose each and every element and limitation of independent claim 1 in the present application, and therefore Bryan does not anticipate independent claim 1 of the present application.

Bryan Does Not Disclose Identifying A User For A Presentation

The Office Action takes the position that Bryan at Figure 3, paragraphs 0034, 0036, 0068, and Bryan's Abstract discloses the first element of claim 1: identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements, each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action

identifier representing a presentation action. Appellants respectfully note in response, however, that what Bryan's Abstract in fact discloses is:

A method and system for creating, using, and updating individual user voice portals in a multi-user environment is disclosed. Each user selects data sources, keywords and time intervals for searching the data sources, and grammar for accessing search results. Based on this information, an individual voice portal is created for the user. The requested information is extracted from the specified data sources and cached or stored in a database to increase extraction speed. The user accesses the individual voice portal using a unique identifier assigned to the user and the selected grammar. Because each user has a unique voice portal, the search space for software that interprets the grammar is decreased. As a result, the likelihood of misinterpretation and the time for extracting the requested information are decreased.

Appellants respectfully note in response that Bryan at paragraph 0068 describes a flowchart for generating and providing access to user-definable voice portals stating:

[0068] FIG. 2 is a flow chart illustrating the overall process flow of the methods and systems for generating and providing access to user-definable voice portals according to an embodiment of the present invention. In FIG. 2, in step ST1, when a user desires to create a voice portal, the user accesses topic radio tuner user interface 100 and topic radio engine 104 assigns the user a unique identifier. This identifier is important because it identifies the user and associates the user with a voice portal. The identifier may be any suitable identifier for uniquely identifying the user. For example, the identifier may be a number or combination of characters selected by the user or generated by the system. In an alternative embodiment, the systems for generating and providing user access to voice portals may use biometric identification methods, such as a voice signature, a fingerprint, retinal scan, or any other suitable identifier for uniquely identifying the user.

Turning to Bryan at Figure 3, Appellants respectfully note that what Bryan at Figure 3 discloses is a flow diagram illustrating the overall user interface flow for creating, accessing and modifying a user-defined voice portal according to an embodiment of the present invention. Bryan's users interact with information through voice portals using grammars consisting of vocabulary words or audio macros that speech recognition

hardware and software recognize for a particular user. The Office Action cites Bryan at paragraph 0034 in an effort to further describe those audio macros stating:

[0034] Audio macros are the words the listener assigns to access either a specific source or piece of information or multiple sources or pieces of information with due regard to the associated reference source, full-text search, and temporal information. Audio macros are similar to bookmarks in a 2D environment and assigned by the listener to access either a specific source or a piece of information or multiple sources of information with due regard to the associated temporal information. They are not finite and static as in other systems, but may be dynamic and infinite. The audio macros create a unique grammar set for that listener and the template in use. Again, grammar is the set of vocabulary words or audio macros that speech recognition hardware and software must recognize for a particular user. The system offers dynamic grammar loading so that the task of speech recognition is much easier than fixed grammar sets. Dynamic grammar loading refers to the loading of all of the particular audio macros for a particular user for a particular session. It is also easier for the user to remember his/her own macros and it is easier for the speech recognition technology to use a smaller set of unique grammar.

Turning now to Bryan at paragraph 0036, which describes a login module utilized by a first time user to establish a voice portal, Appellants respectfully note in response that what Bryan at paragraph 0036, in fact discloses is:

[0036] The login module has a registration component for first time listeners to provide basic set-up information. Accessed via any suitable user interface, such as the Internet for sophisticated computer users or an 800 number for those with out computer/internet familiarity, the module acts as a conduit for collecting data such as name, address, phone number, PIN number, voice authentication, fingerprint or other ID number, email addresses (home, work, groups), fax number, GPS, and other basic information. Once the user is registered, the user may just log in.

In summary of the cited portions of Bryan above, Applicants note that the Abstract of Bryan discloses creating, using, and updating individual user voice portals in a multi-user environment through grammars consisting of vocabulary words or audio macros that speech recognition hardware and software recognize for a particular user. Bryan at paragraph 0034 discloses that those audio macros are the words the listener assigns to

access either a specific source or piece of information. As disclosed in Bryan at paragraph 0036, first time users may utilize Bryan's login module with a registration component to provide basic set-up information, and Bryan at paragraph 0068 discloses that each user is assigned a unique identifier that is used to associate that user with a particular voice portal. Bryan, at the reference points cited above and all other reference points in Bryan, however, does not disclose identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements. each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action as claimed in the present application.

The first reason that Bryan does not disclose Appellants' claims is that Bryan does not disclose a key phrase for invoking a presentation action included in a grammar element as claimed in the present application. The Office Action takes the position that Bryan's Figure 3, step 3, discloses a key phrase for invoking a presentation action included in a grammar element as claimed here. Bryan's Figure 3, step 3, however merely discloses a topic radio tuner user interface that provides audio, graphical, or archival copy output to a user. A presentation action "directs the presentation of a document such as by moving the presentation to the next page of the document, the previous paragraph of the document and so on." *See* Appellants' original specification at page 2, lines 10-12. That is, a presentation action controls a user's navigation through a particular document. Appellants' application describes that such document navigation is controlled based on key phrases provided by a user. In such a manner, a user provides a key phrase included in a particular grammar element, which in turn, triggers a specific presentation action to control document navigation. In contrast, Bryan's topic radio tuner user interface merely generates output that is rendered to a user without any mention of controlling document navigation in response to a key phrase included in a grammar element. Because Bryan does not disclose each any every element and limitation of Appellants' claim, Bryan does not anticipate Appellants' claims, and the rejections should be withdrawn.

In addition to the fact that Bryan does not disclose a presentation action invoked by a key phrase, there is another reason that Bryan does not disclose the first element of claim 1 in the present application: Bryan does not disclose a user grammar that includes grammar elements, each of which include an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action as claimed in the present application. The Office Action takes the position that Bryan's Abstract discloses a grammar element. As mentioned above, Bryan's Abstract actually discloses creating, using, and updating individual user voice portals in a multi-user environment using grammars. Bryan at paragraph 0034 describes Bryan's grammars as merely a "set of vocabulary words or audio macros that speech recognition hardware and software must recognize for a particular user." Nowhere however does Bryan ever once describe that Bryan's grammars include an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action. Because Bryan does not disclose each and every element and limitation of Appellants' claims, Bryan does not anticipate Appellants' claims, and the rejections under 35 U.S.C. § 102 should be withdrawn.

**Bryan Does Not Disclose Storing A Multiplicity
Of User Grammar Elements For The User In
A Voice Response Grammar On A Voice
Response Server**

The Office Action takes the position that Bryan at paragraphs 0034 and 0067 discloses the second element of claim 1: storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server. As mentioned above, Appellants note that Bryan at paragraph 0034 discloses audio macros utilized in Bryan by users to interact with information through voice portals. Bryan's audio macros are the words that a listener assigns to access either a specific source or piece of information. Appellants also respectfully note in response that what Bryan at paragraph 0067, in fact discloses is:

[0067] The modules and databases illustrated in FIG. 1 may execute on any suitable hardware platform. In a preferred embodiment, the hardware platform comprises one or more enterprise servers 118. Enterprise servers

suitable for use with embodiments of the present invention include the Enterprise 220 or 440 servers available from SUN Microsystems and the RISC 6600 available from IBM Corporation.

That is, Bryan at paragraph 0067 discloses suitable enterprise servers for use with Bryan's voice portals with which users interact using audio macros. Neither Bryan's voice portals with which users interact using audio macros nor Bryan's suitable enterprise servers for use with Bryan's invention discloses storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server as claimed in the present application. As discussed above, Bryan does not disclose user grammar elements as claimed in the present application because Bryan does not disclose any grammar elements that include an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action. Without more, Bryan at the cited portions above cannot disclose storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server as claimed in the present application. Because Bryan does not disclose each and every element and limitation of Appellants' claims, Bryan does not anticipate Appellants' claims, and the rejections under 35 U.S.C. § 102 should be withdrawn.

**Bryan Does Not Enable Each and Every Element
Of The Claim Of The Present Application**

Not only must Bryan disclose each and every element of the claims of the present application within the meaning of *Verdegaal* in order to anticipate Appellants' claims, but also Bryan must be an enabling disclosure of each and every element of the claims of the present application within the meaning of *In re Hoeksema*. In *Hoeksema*, the claims were rejected because an earlier patent disclosed a structural similarity to the Appellant's chemical compound. The court in *Hoeksema* stated: "We think it is sound law, consistent with the public policy underlying our patent law, that before any publication can amount to a statutory bar to the grant of a patent, its disclosure must be such that a skilled artisan could take its teachings in combination with his own knowledge of the particular art and be in possession of the invention." *In re Hoeksema*, 399 F.2d 269, 273,

158 USPQ 596, 600 (CCPA 1968). The meaning of *Hoeksema* for the present case is that unless Bryan places Appellants' claims in the possession of a person of ordinary skill in the art, Bryan is legally insufficient to anticipate Appellants' claims under 35 U.S.C. § 102. As explained above, Bryan does not disclose each and every element and limitation of claim 1 of the present application. Because Bryan does not disclose each and every element and limitation of the independent claim, Bryan cannot possibly place the elements and limitations of the independent claim in the possession of a person of ordinary skill in the art. Bryan cannot, therefore, anticipate claim 1 of the present application.

Relations Among Claims

Independent claim 1 claims method aspects of creating a voice response grammar in a voice response server according to embodiments of the present invention. Independent claims 9 and 17 respectively claim system and computer program product aspects of creating a voice response grammar in a voice response server according to embodiments of the present invention. Claim 1 is allowable for the reasons set forth above. Claims 9 and 17 are allowable because claim 1 is allowable. The rejections of claims 9 and 17 therefore should be withdrawn, and claims 9 and 17 should be allowed.

Claims 2-8, 10-16, and 18-24 depend from independent claims 1, 9, and 17. Each dependent claim includes all of the limitations of the independent claim from which it depends. Because Bryan does not disclose and enable each and every element of the independent claims, Bryan cannot possibly disclose and enable each and every element of any dependent claim. The rejections of claims 2-8, 10-16, and 18-24 therefore should be withdrawn, and these claims also should be allowed.

Conclusion Of Appellant's Arguments

Claims 1-24 stand rejected under 35 U.S.C. § 102 as being anticipated by Bryan. As shown above, Bryan does not disclose and enable each and every element of Appellants'

claims. Claims 1-24 are therefore patentable and should be allowed. Appellants respectfully request reconsideration of claims 1-24.

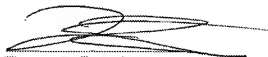
In view of the arguments above, reversal on all grounds of rejection is requested.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

Date: March 7, 2008

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**APPENDIX OF CLAIMS
ON APPEAL IN PATENT APPLICATION OF
WILLIAM K. BODIN, *ET AL.*, SERIAL NO. 10/733,941**

CLAIMS

Listing of Claims:

1. A method for creating a voice response grammar in a voice response server, the method comprising:

identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements, each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action; and

storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server.
2. The method of claim 1 wherein identifying a user for a presentation comprises:

creating a data structure representing a presentation; and

listing in the data structure at least one user identification.
3. The method of claim 1 wherein the user grammar comprises a multiplicity of user grammar elements for a content type, the method further comprising:

identifying presentation documents for the presentation, each presentation document having a content type; and

selecting user grammar elements according to the content type of the identified presentation documents;

wherein storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes storing the selected user grammar elements in the voice response grammar.

4. The method of claim 1 wherein the user grammar comprises a multiplicity of user grammar elements, the method further comprising:

identifying presentation documents for the presentation, the presentation documents including structured documents having structural element identifiers; and

selecting user grammar elements in dependence upon the structural element identifiers;

wherein storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes storing the selected user grammar elements in the voice response grammar.

5. The method of claim 1 wherein the user grammar comprises a multiplicity of user grammar elements, the method further comprising:

identifying presentation documents for the presentation, each presentation document having a presentation grammar including presentation action identifiers; and

selecting user grammar elements in dependence upon the presentation action identifiers;

wherein storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes storing the selected user grammar elements in the voice response grammar.

6. The method of claim 1 further comprising creating a presentation document, including:

creating, in dependence upon an original document, a structured document comprising one or more structural elements;

classifying a structural element of the structured document according to a presentation attribute; and

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.

7. The method of claim 6 wherein classifying a structural element comprises:

identifying a presentation attribute for the structural element;

identifying a classification identifier in dependence upon the presentation attribute; and

inserting the classification identifier in association with the structural element in the structured document.

8. The method of claim 6 wherein creating a presentation grammar for the structured document comprises:

identifying the content type of the original document;

selecting, in dependence upon the content type, a full presentation grammar from among a multiplicity of full presentation grammars; and

filtering the full presentation grammar into a presentation grammar for the structured document in dependence upon the structural elements of the structured document.

9. A system for creating a voice response grammar in a voice response server, the system comprising:

means for identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements, each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action; and

means for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server.

10. The system of claim 9 wherein means for identifying a user for a presentation comprises:

means for creating a data structure representing a presentation; and

means for listing in the data structure at least one user identification.

11. The system of claim 9 wherein the user grammar comprises a multiplicity of user grammar elements for a content type, the system further comprising:

means for identifying presentation documents for the presentation, each presentation document having a content type; and

means for selecting user grammar elements according to the content type of the identified presentation documents;

wherein means for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes means for storing the selected user grammar elements in the voice response grammar.

12. The system of claim 9 wherein the user grammar comprises a multiplicity of user grammar elements, the system further comprising:

means for identifying presentation documents for the presentation, the presentation documents including structured documents having structural element identifiers; and

means for selecting user grammar elements in dependence upon the structural element identifiers;

wherein means for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes means for storing the selected user grammar elements in the voice response grammar.

13. The system of claim 9 wherein the user grammar comprises a multiplicity of user grammar elements, the system further comprising:

means for identifying presentation documents for the presentation, each presentation document having a presentation grammar including presentation action identifiers; and

means for selecting user grammar elements in dependence upon the presentation action identifiers;

wherein means for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes means for storing the selected user grammar elements in the voice response grammar.

14. The system of claim 9 further comprising creating a presentation document, including:

means for creating, in dependence upon an original document, a structured document comprising one or more structural elements;

means for classifying a structural element of the structured document according to a presentation attribute; and

means for creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.

15. The system of claim 14 wherein means for classifying a structural element comprises:

means for identifying a presentation attribute for the structural element;

means for identifying a classification identifier in dependence upon the presentation attribute; and

means for inserting the classification identifier in association with the structural element in the structured document.

16. The system of claim 14 wherein means for creating a presentation grammar for the structured document comprises:

means for identifying the content type of the original document;

means for selecting, in dependence upon the content type, a full presentation grammar from among a multiplicity of full presentation grammars; and

means for filtering the full presentation grammar into a presentation grammar for the structured document in dependence upon the structural elements of the structured document.

17. A computer program product for creating a voice response grammar in a voice response server, the computer program product comprising:

a recording medium;

means, recorded on the recording medium, for identifying a user for a presentation, the user having a user grammar, the user grammar including one or more user grammar elements, each user grammar element including an identifier of a structural element, a key phrase for invoking a presentation action, and a presentation action identifier representing a presentation action; and

means, recorded on the recording medium, for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server.

18. The computer program product of claim 17 wherein means, recorded on the recording medium, for identifying a user for a presentation comprises:

means, recorded on the recording medium, for creating a data structure representing a presentation; and

means, recorded on the recording medium, for listing in the data structure at least one user identification.

19. The computer program product of claim 17 wherein the user grammar comprises a multiplicity of user grammar elements for a content type, the computer program product further comprising:

means, recorded on the recording medium, for identifying presentation documents for the presentation, each presentation document having a content type; and

means, recorded on the recording medium, for selecting user grammar elements according to the content type of the identified presentation documents:

wherein means, recorded on the recording medium, for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes means, recorded on the recording medium, for storing the selected user grammar elements in the voice response grammar.

20. The computer program product of claim 17 wherein the user grammar comprises a multiplicity of user grammar elements, the computer program product further comprising:

means, recorded on the recording medium, for identifying presentation documents for the presentation, the presentation documents including structured documents having structural element identifiers; and

means, recorded on the recording medium, for selecting user grammar elements in dependence upon the structural element identifiers;

wherein means, recorded on the recording medium, for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes means, recorded on the recording medium, for storing the selected user grammar elements in the voice response grammar.

21. The computer program product of claim 17 wherein the user grammar comprises a multiplicity of user grammar elements, the computer program product further comprising:

means, recorded on the recording medium, for identifying presentation documents for the presentation, each presentation document having a presentation grammar including presentation action identifiers; and

means, recorded on the recording medium, for selecting user grammar elements in dependence upon the presentation action identifiers;

wherein means, recorded on the recording medium, for storing a multiplicity of user grammar elements for the user in a voice response grammar on a voice response server includes means, recorded on the recording medium, for storing the selected user grammar elements in the voice response grammar.

22. The computer program product of claim 17 further comprising creating a presentation document, including:

means, recorded on the recording medium, for creating, in dependence upon an original document, a structured document comprising one or more structural elements;

means, recorded on the recording medium, for classifying a structural element of the structured document according to a presentation attribute; and

means, recorded on the recording medium, for creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.

23. The computer program product of claim 22 wherein means, recorded on the recording medium, for classifying a structural element comprises:

means, recorded on the recording medium, for identifying a presentation attribute for the structural element;

means, recorded on the recording medium, for identifying a classification identifier in dependence upon the presentation attribute; and

means, recorded on the recording medium, for inserting the classification identifier in association with the structural element in the structured document.

24. The computer program product of claim 22 wherein means, recorded on the recording medium, for creating a presentation grammar for the structured document comprises:

means, recorded on the recording medium, for identifying the content type of the original document;

means, recorded on the recording medium, for selecting, in dependence upon the content type, a full presentation grammar from among a multiplicity of full presentation grammars; and

means, recorded on the recording medium, for filtering the full presentation grammar into a presentation grammar for the structured document in dependence upon the structural elements of the structured document.

**APPENDIX OF EVIDENCE
ON APPEAL IN PATENT APPLICATION OF
WILLIAM K. BODIN, *ET AL.*, SERIAL NO. 10/733,941**

This is an evidence appendix in accordance with 37 CFR § 41.37(c)(1)(ix).

There is in this case no evidence submitted pursuant to 37 CFR §§ 1.130, 1.131, or 1.132, nor is there in this case any other evidence entered by the examiner and relied upon by the Appellants.

RELATED PROCEEDINGS APPENDIX

This is a related proceedings appendix in accordance with 37 CFR § 41.37(c)(1)(x).

There are no decisions rendered by a court or the Board in any proceeding identified pursuant to 37 CFR § 41.37(c)(1)(ii).